

FILED

APR - 4 2013

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY [Signature] DEPT [Redacted]~~SEALED~~**CASE UNSEALED PER ORDER OF COURT**

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

December 2012 Grand Jury

8	UNITED STATES OF AMERICA,) Case No. <u>13CR1128-BEN</u>
9	Plaintiff,) <u>I N D I C T M E N T</u>
10	v.) <u>(Superseding)</u>
11	LAURA CRUZ (1),) Title 21, U.S.C., Secs. 841(a)(1)
12	RAUL ALVARADO (2),) and 846 - Conspiracy to Distribute
13	aka Penguin,) Methamphetamine; Title 21, U.S.C.,
14	ROBERT RODRIGUEZ (3),) Secs. 952, 960(b)(1)(H) and 963 -
15	aka Bouncer,) Conspiracy to Import
16	CARRIE BROWN-RODRIGUEZ (4),) Methamphetamine; Title 21, U.S.C.,
17	ANTHONY PALAFOX (5),) Sec. 841(a)(1) - Distribution of
18	aka Goofy or G,) Methamphetamine; Title 21, U.S.C.,
19	JESSICA HOLGUIN (6),) Sec. 841(a)(1) - Possession of
20	ROBERT AGUILAR (7),) Methamphetamine with Intent to
21	aka Gangster,) Distribute; Title 18, U.S.C.,
22	CRISTIAN GARDUNO (8),) Sec. 2 - Aiding and Abetting;
23	ERICK GARCIA-MARTINEZ (9),) Title 21, U.S.C., Sec. 853 -
24	JOSHUA SANCHEZ (10),) Criminal Forfeiture
25	aka Negro or Black,)
26	TRAVIS JOB (11),)
27	BRIAN RAMIREZ (12),)
28	aka Youngster,)
	ANDY ESPINOZA (13),)
	aka Lil Chops,)
	LORI STORY (14),)
	ANGEL OLmos (15),)
	aka Wizard,)
	BRAD WOOLARD (16),)
	JOSE ANTONIO (17),)
	aka Lil Joe or Negro,)
	EMILY BAKER (18),)
	MONORIN PHIKEO (19),)
	aka Lap,)
	JESSICA KISNER (20),)
	HECTOR MEDRANO (21),)
	FRANKIE KING (22),)
	Defendants.)

The grand jury charges:

Count 1

3 Beginning at a date unknown and continuing through February 2013,
4 within the Southern District of California and elsewhere, defendants
5 LAURA CRUZ, RAUL ALVARADO, aka Penguin, ROBERT RODRIGUEZ, aka Bouncer,
6 CARRIE BROWN-RODRIGUEZ, ANTHONY PALAFOX, aka Goofy or G, JESSICA
7 HOLGUIN, ROBERT AGUILAR, aka Gangster, CRISTIAN GARDUNO, ERICK GARCIA-
8 MARTINEZ, JOSHUA SANCHEZ, aka Negro, TRAVIS JOB, BRIAN RAMIREZ,
9 aka Youngster, ANDY ESPINOZA, aka Lil Chops, LORI STORY, ANGEL OLmos,
10 aka Wizard, BRAD WOOLARD, JOSE ANTONIO, aka Lil Joe or Negro, EMILY
11 BAKER, MONORIN PHIAKEO, aka Lap, JESSICA KISNER, HECTOR MEDRANO and
12 FRANKIE KING did knowingly and intentionally conspire together and
13 with each other and with other persons known and unknown to the grand
14 jury to distribute 50 grams and more of methamphetamine (actual) or
15 500 grams and more of a mixture containing methamphetamine, a
16 Schedule II Controlled Substance; in violation of Title 21, United
17 States Code, Sections 841(a)(1), (b)(1)(A)(viii) and 846.

Count 2

19 Beginning at a date unknown to the grand jury and continuing up
20 to and including February 2013, within the Southern District of
21 California, and elsewhere, defendants LAURA CRUZ, ROBERT RODRIGUEZ,
22 aka Bouncer, CARRIE BROWN-RODRIGUEZ, CRISTIAN GARDUNO and ERICK
23 GARCIA-MARTINEZ did knowingly and intentionally conspire together and
24 with each other and with other persons known and unknown to the grand
25 jury to import 50 grams and more of methamphetamine (actual) or
26 500 grams and more of a mixture containing methamphetamine, a
27 Schedule II Controlled Substance, into the United States from a place
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1 outside thereof; in violation of Title 21, United States Code,
2 Sections 952, 960(b)(1)(H) and 963.

3 Count 3

4 On or about June 27, 2012, within the Southern District of
5 California, defendants ROBERT RODRIGUEZ, aka Bouncer, CARRIE BROWN-
6 RODRIGUEZ, BRIAN RAMIREZ, aka Youngster, and ANDY ESPINOZA, aka Lil
7 Chops, did knowingly and intentionally distribute 50 grams and more
8 of methamphetamine, to wit: approximately 109.9 grams of
9 methamphetamine (actual), a Schedule II Controlled Substance; in
10 violation of Title 21, United States Code, Section 841(a)(1) and
11 (b)(1)(A)(viii), and Title 18, United States Code, Section 2.

12 Count 4

13 On or about October 19, 2012, within the Southern District of
14 California, defendant LAURA CRUZ did knowingly and intentionally
15 distribute 50 grams and more of methamphetamine, to wit: approximately
16 176 grams of methamphetamine (actual), a Schedule II Controlled
17 Substance; in violation of Title 21, United States Code,
18 Section 841(a)(1) and (b)(1)(A)(viii).

19 Count 5

20 On or about December 5, 2012, within the Southern District of
21 California, defendant TRAVIS JOB did knowingly and intentionally
22 possess with the intent to distribute 50 grams and more of
23 methamphetamine, to wit: approximately 56.4 grams of methamphetamine
24 (actual), a Schedule II Controlled Substance; in violation of
25 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

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Count 6

On or about December 22, 2012, within the Southern District of California, defendants ANTHONY PALAFOX, aka Goofy or G, and JESSICA HOLGUIN did knowingly and intentionally possess with the intent to distribute 50 grams and more of methamphetamine, to wit: approximately 54.8 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2.

Forfeiture Allegations

Forfeiture for Title 21 Violation

12 The allegations contained in Counts 1 through 6 are realleged and
13 by their reference fully incorporated herein for the purpose of
14 alleging forfeiture to the United States of America pursuant to the
15 provisions of Title 21, United States Code, Section 853.

16 As a result of the commission of the felony offenses alleged in
17 Counts 1 through 6 of this indictment, said violation being punishable
18 by imprisonment for more than one year and pursuant to Title 21,
19 United States Code, Section 853(a)(1) and 853(a)(2), defendants LAURA
20 CRUZ, RAUL ALVARADO, aka Penguin, ROBERT RODRIGUEZ, aka Bouncer,
21 CARRIE BROWN-RODRIGUEZ, ANTHONY PALAFOX, aka Goofy or G, JESSICA
22 HOLGUIN, ROBERT AGUILAR, aka Gangster, CRISTIAN GARDUNO, ERICK GARCIA-
23 MARTINEZ, JOSHUA SANCHEZ, aka Negro, TRAVIS JOB, BRIAN RAMIREZ, aka
24 Youngster, ANDY ESPINOZA, aka Lil Chops, LORI STORY, ANGEL OLmos, aka
25 Wizard, BRAD WOOLARD, JOSE ANTONIO, aka Lil Joe or Negro, EMILY
26 BAKER, MONORIN PHIKEO, aka Lap, JESSICA KISNER, HECTOR MEDRANO and
27 FRANKIE KING shall, upon conviction, forfeit to the United States all
28 their rights, title and interest in any and all property constituting,

1 or derived from, any proceeds the defendants obtained, directly or
2 indirectly, as the result of the offenses, and any and all property
3 used or intended to be used in any manner or part to commit and to
4 facilitate the commission of the violations alleged in this indictment
5 including but not limited to: specifically describe any vehicles,
6 cash, firearms, (make, model, serial number) etc.

7 If any of the above-described forfeitable property, as a result
8 of any act or omission of the defendant -

9 (a) cannot be located upon the exercise of due diligence;
10 (b) has been transferred or sold to, or deposited with, a third
11 party;

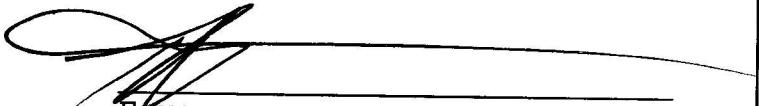
12 (c) has been placed beyond the jurisdiction of the Court;
13 (d) has been substantially diminished in value; or
14 (e) has been commingled with other property which cannot be
15 subdivided without difficulty;

16 it is the intent of the United States, pursuant to Title 21, United
17 States Code, Section 853(p), to seek forfeiture of any other property
18 of the defendant up to the value of the said property listed above as
19 being subject to forfeiture.

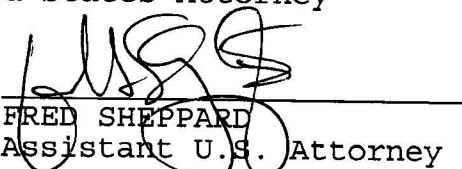
20 All in violation of Title 21, United States Code, Section 853.

21 DATE: April 4, 2013.

22 A TRUE BILL:

23 
24 Foreperson

25 LAURA E. DUFFY
26 United States Attorney

27 By: 
28 FRED SHEPPARD
Assistant U.S. Attorney